Exhibit A

CIRCUIT COURT SUMMONS

NASHVILLE, TENNESSEE

Service ID 468035

STATE OF TENNESSEE DAVIDSON COUNTY 20™ JUDICIAL DISTRICT

LUCAS, IAN HUNTER

Plaintiff

CIVIL ACTION DOCKET NO. 24C2481 Method of Service: Davidson County Sheriff

VS

Service ID 468035

VANDERBILT UNIVERSITY 2100 WEST END AVENUE **SUITE 1100** NASHVILLE, TN 37203

RECEIVED

OCT 17 2024

Defendant

Vanderbilt University Office of the General Counsel

To the above named Defendant:

You are summoned to appear and defend a civil action filed against you in the Circuit Court, 1 Public Square, Room 302, P.O. Box 196303, Nashville, TN 37219-6303, and your defense must be made within thirty (30) days from the date this Summons is served upon you. You are further directed to file your defense with the Clerk of the Court and send a copy to the Plaintiff's attorney at the address listed below.

In case of your failure to defend this action by the above date, judgment by default will be rendered against you for the relief demanded in the Complaint,

ISSUED: 10/15/2024

JOSEPH P. DAY Circuit Court Clerk Davidson County, Tennessee

Deputy Clerk

ADDRESS OF PLAINTIFF'S ATTORNEY OR PLAINTIFF: IAN HUNTER LUCAS 221 CHARLESTON AVE PLEASANT VIEW, TN 37146

NOTICE TO THE DEFENDANT:

Tennessee law provides a Ten Thousand and 00/100 Dollars (\$10,000.00) debtor's equity interest personal property exemption from execution or seizure to satisfy a judgment. If a judgment should be entered against you in this action and you wish to claim property as exempt, you must file a written list, under oath, of the items you wish to claim as exempt with the Clerk of the Court. The list may be filed at any time and may be changed by you thereafter as necessary; however, unless it is filed before the judgment becomes final, it will not be effective as to any execution or gamishment issued prior to the filing of the list. Certain items are automatically exempt by law and do not need to be listed; these include items of necessary wearing apparel (clothing) for yourself and your family and trunks or other receptacles necessary to contain such apparel, family portraits, the family Bible, and school books. Should any of these items be seized, you would have the right to recover them. If you do not understand your exemption right or how to exercise it, you may wish to seek the counsel of a lawyer.

To request an ADA accommodation, please contact Trey Collier at (615) 880-3309

rev. 09/01/2022

Case 3:24-cv-01359

Document 1-1 Filed 11/15/24 Page 2 of 50 PageID #: 6

IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

IAN HUNTER LUCAS,
Plaintiff,

RECEIVED

V.

OCT 1 7 2024

VANDERBILT UNIVERSITY

vanderbilt University
VANDERBILT UNIVERSITY SCHOOL OF NURSING ffice of the General Counsel
Defendants.

VERIFIED COMPLAINT
JURY DEMAND ENDORSED HEREIN
UNDER SEAL AND IN CHAMBER REVIEW



FCA NOTICE OF FILING UNDER SEAL

Pursuant to 31 U.S.C. § 3730(b)(2), this Verified Complaint is being filed under seal. The contents herein contain confidential, sensitive, or proprietary information, including but not limited to personal health information (PHI) subject to the Health Insurance Portability and Accountability Act (HIPAA) and other privacy regulations. Access to this document is restricted and it shall remain under seal until further order of the Court.

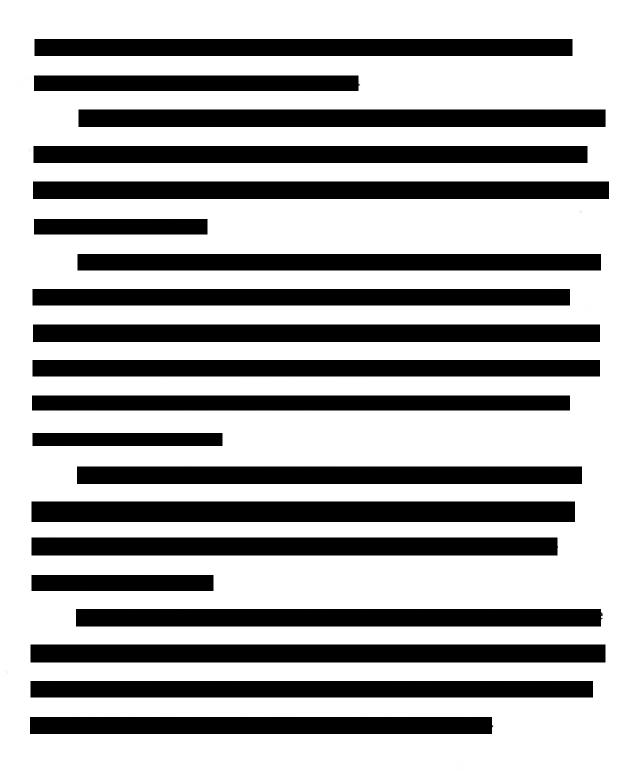
IN THE CIRCUIT COURT OF DAVIDSON COUNTY, TENNESSEE FOR THE TWENTIETH JUDICIAL DISTRICT AT NASHVILLE

IAN HUNTER LUCAS,	
Plaintiff, v.	
VANDERBILT UNIVERSITY	
and	
VANDERBILT UNIVERSITY SCHOOL OF NURSING,	
Defendants.	
Case No	
VERIFIED COMPLAINT	
JURY DEMAND ENDORSED HEREIN	
UNDER SEAL AND IN CHAMBER REVIEW	
I. INTRODUCTION	

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II. JURISDICTION			
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III. PARTIES			

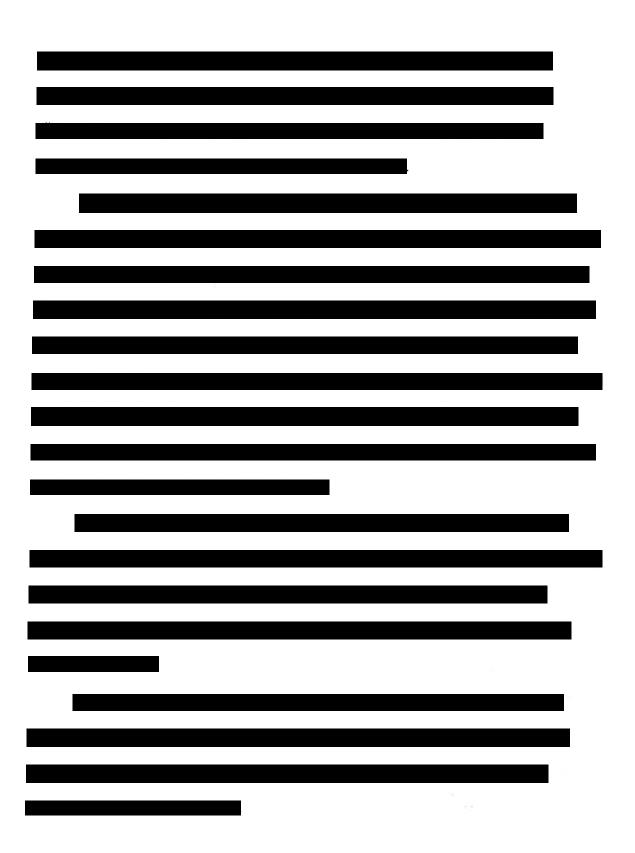
STATUTE OF LIMITATIONS	
EXHAUSTION OF ADMINISTRATIVE REMEDIES	

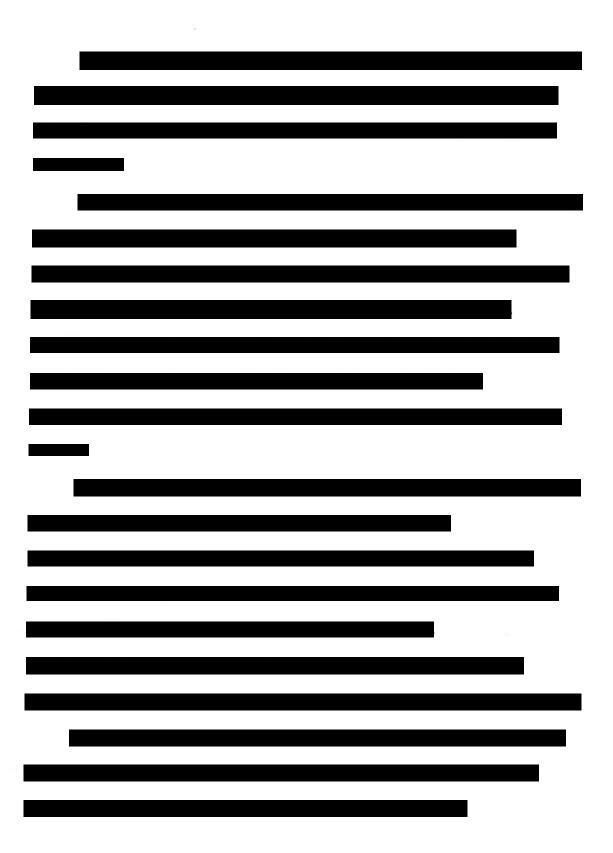
CONFIDENT	FIALITY AND HIPAA COMPLIANCE	



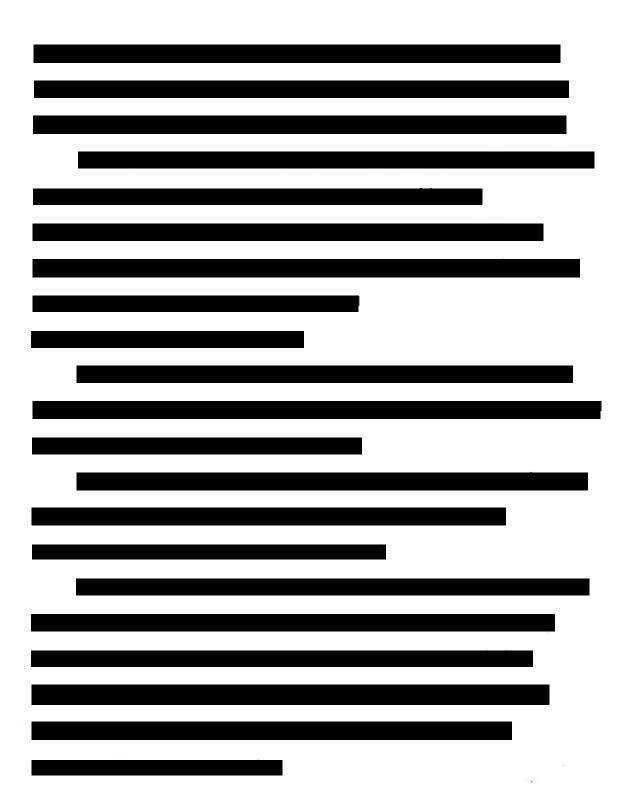
	IV. GENERAL A	ALLEGATIONS		
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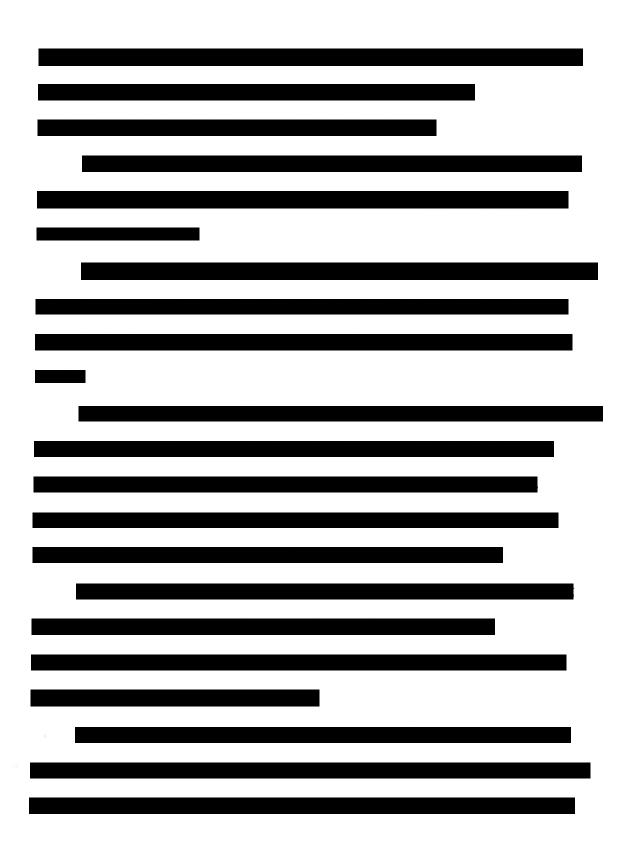


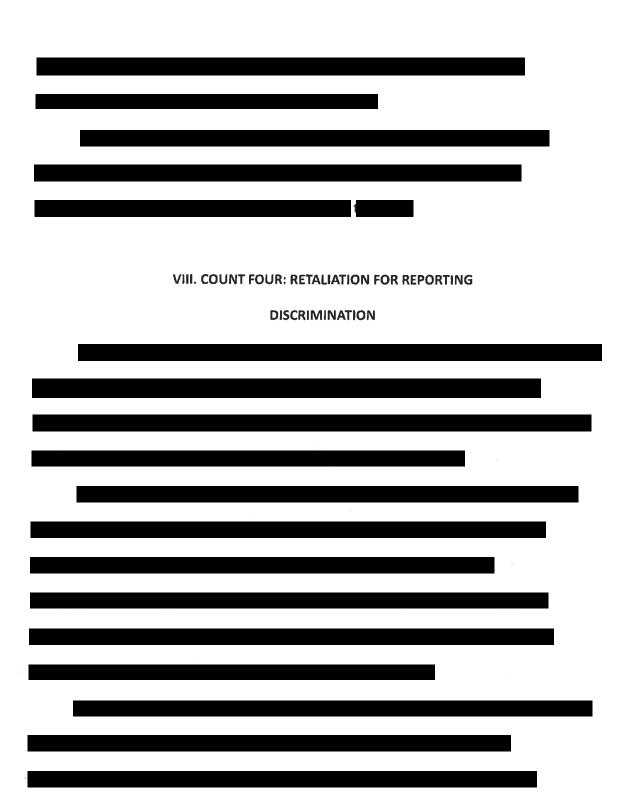
V. COUNT ONE: BREACH OF CONTRACT

	VI. COUNT TWO: BREACH OF THE IMPLIED COVENANT OF GOOD
	FAITH AND FAIR DEALING
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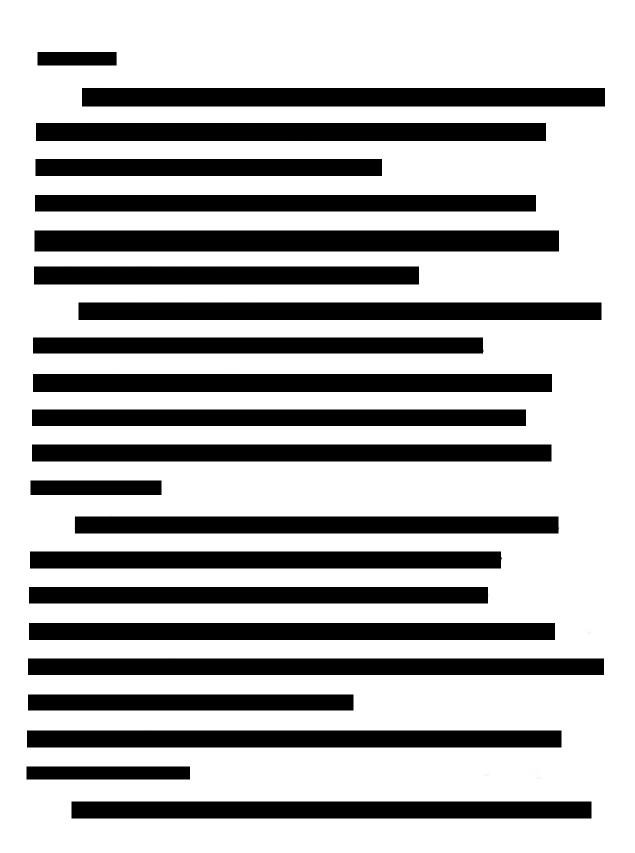
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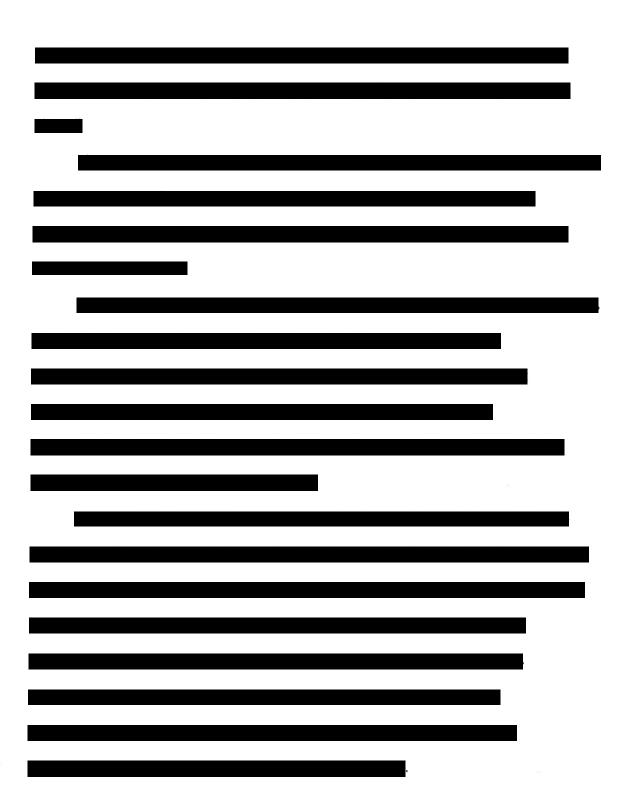
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VII. COUNT THREE: DISCRIMINATION UNDER THE AMERICANS	
WITH DISABILITIES ACT (ADA)	



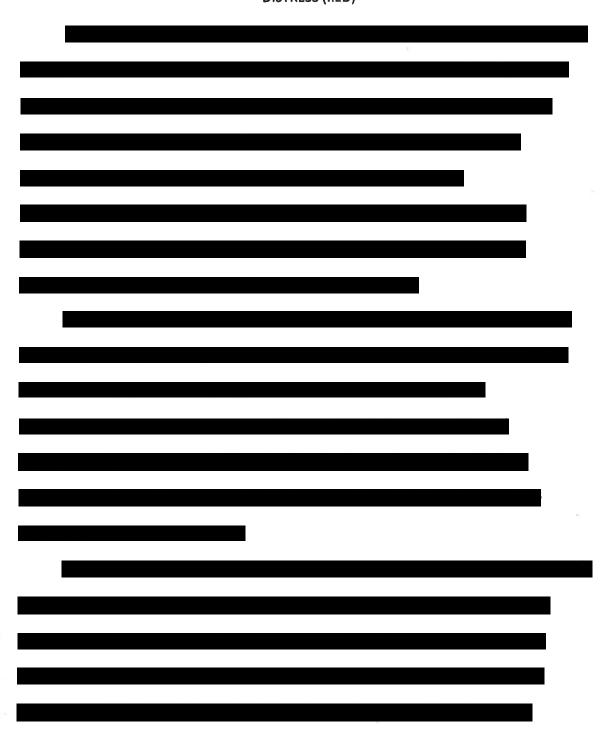


X. COUNT FIVE: VIOLATION OF SECTION 504 OF THE
REHABILITATION ACT





X. COUNT SIX: INTENTIONAL INFLICTION OF EMOTIONAL DISTRESS (IIED)



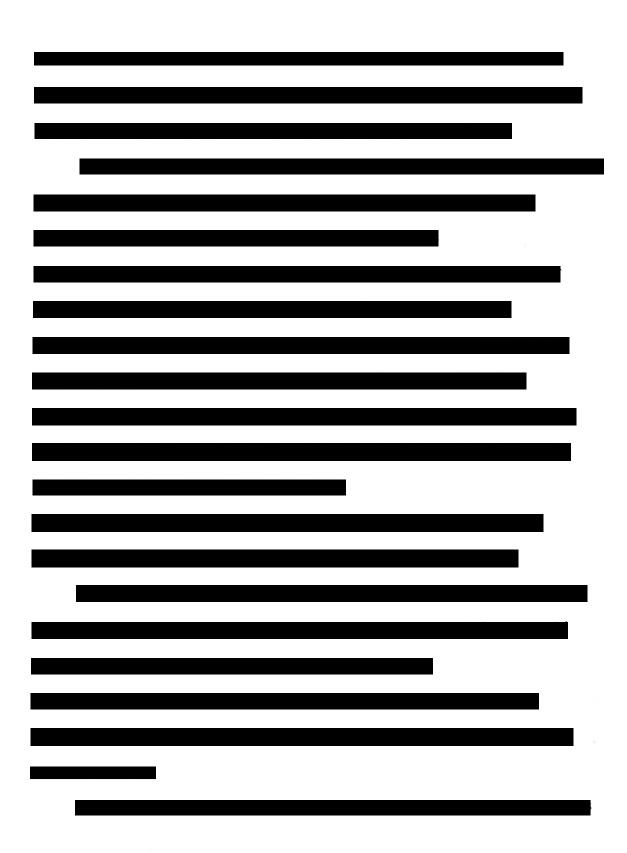
XI. COUNT SEVEN: NEGLIGENCE	

XII. COUNT EIGHT: DEFAMATION (LIBEL AND SLANDER)	

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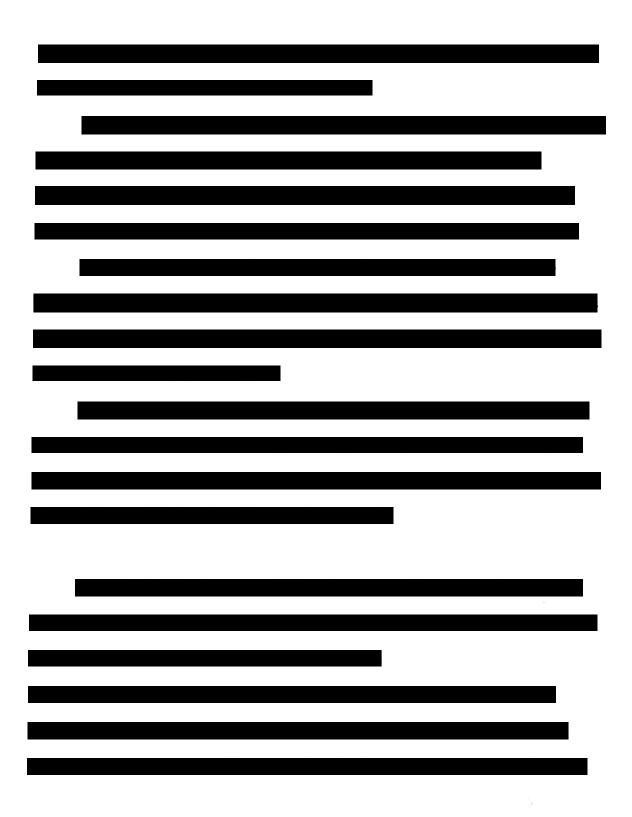
XIII. COUNT NINE: INVASION OF PRIVACY

XIV. COUNT TEN: DUE PROCESS VIOLATIONS UNDER STATE LAW	

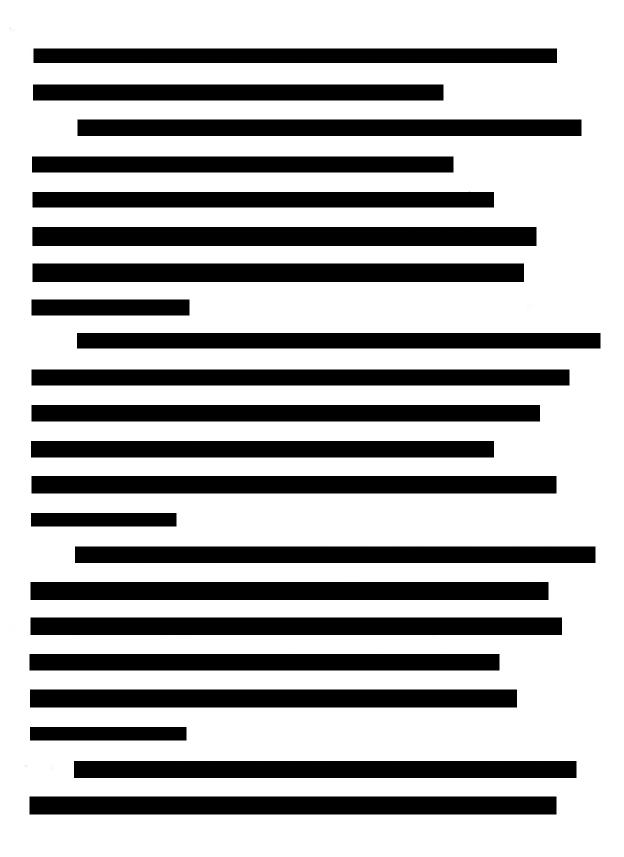


	XV. COUNT ELEVEN: WRONGFUL TERMINATION	
(8)		

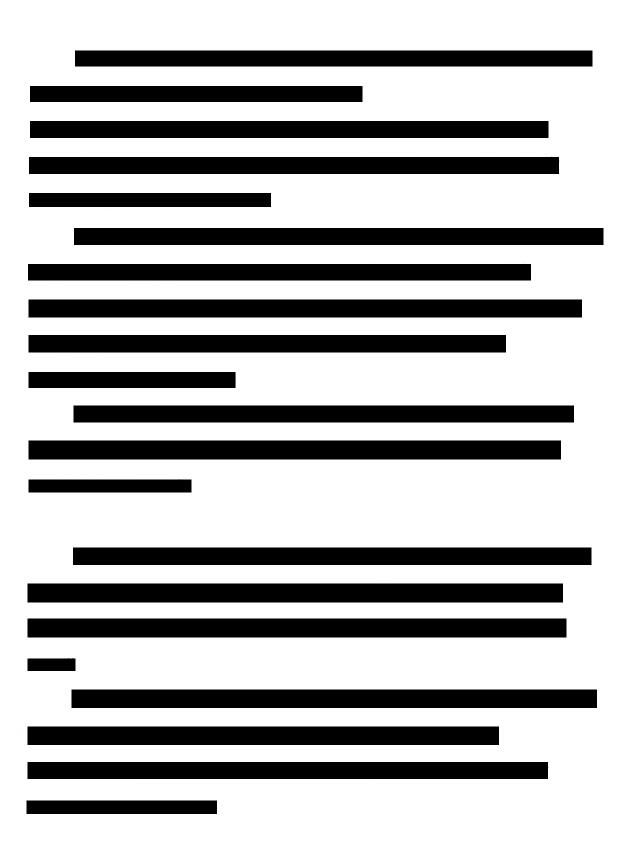
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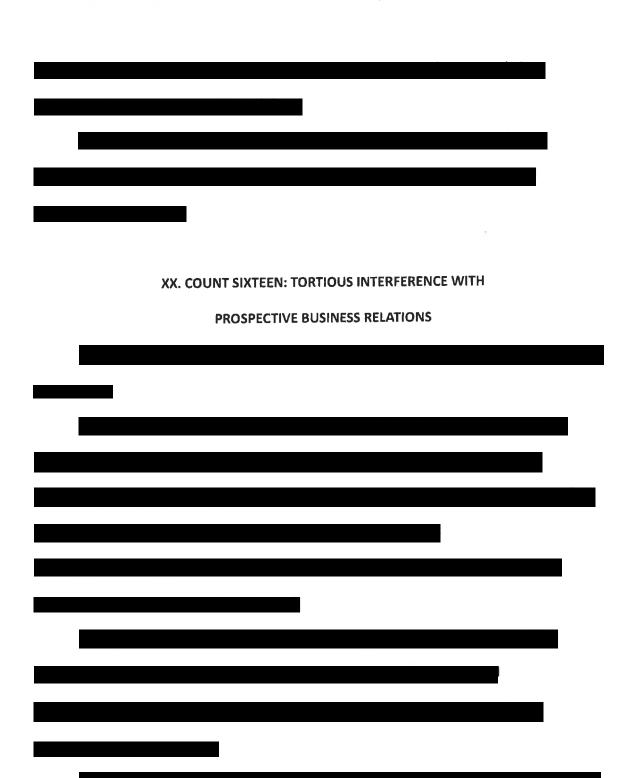
x	(VII. COUNT THIRTEEN: DISPARATE TREATMENT UNDER STATE
•	ANTI-DISCRIMINATION LAWS



XVIII. COUNT FOURTEEN: FAILURE TO COMPLY WITH	
TENNESSEE'S COMPUTER-RELATED CRIMES STATUTES	

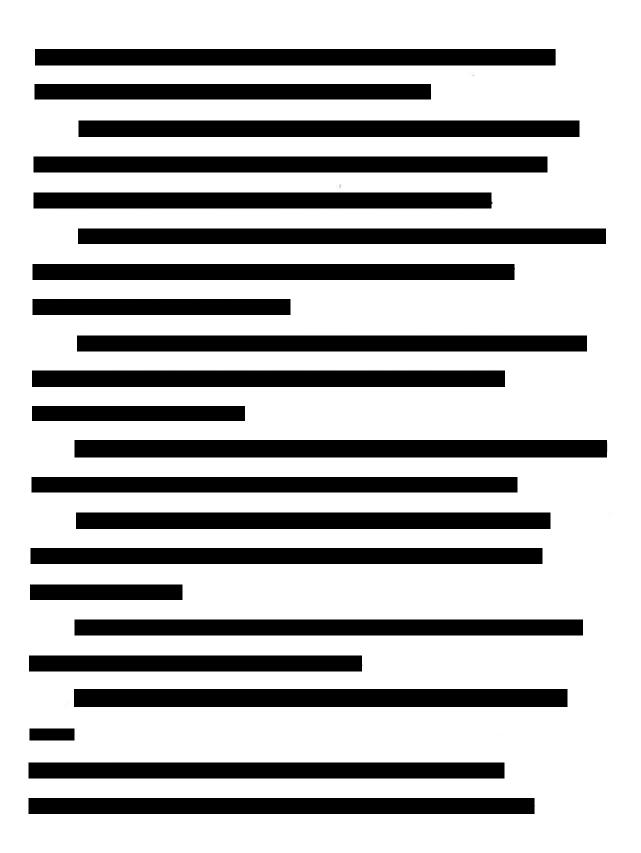
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XIX. COUNT FIFTEEN: NEGLIGENT INFLICTION OF EMOTIONAL	
DISTRESS	

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XXI. CONCLUSION



JURY DEMAND:

Respectfully submitted,

/s/ Ian Hunter Lucas
IAN HUNTER LUCAS
Pro Se
Dated: March 12, 2024
221 Charleston Avenue
Pleasant View, TN, 37126
(910) 872-3577 (telephone)
ian.h.lucas@protonmail.com
ianhunterlucas@outlook.com
Plaintiff Pro Se

DECLARATION OF VERIFIED COMPLAINT

I, Ian Hunter Lucas, declare as follows:

- 1. I am the Plaintiff in the above-captioned matter.
- 2. I have read the foregoing Verified Complaint and know the contents thereof.
- 3. The allegations contained therein are true and correct to the best of my knowledge, information, and belief.
- 4. I understand that by verifying this Complaint, I am swearing under penalty of perjury under the laws of the United States of America and the State of Tennessee that the foregoing is true and correct.

Executed on this <u>6th</u> day of <u>October</u>, 2024, at Pleasant View, Tennessee.

Respectfully Submitted,
/s/ Ian Hunter Lucas
IAN HUNTER LUCAS
Plaintiff Pro Se
221 Charleston Avenue
Pleasant View, TN 37146
(910) 872-3577
ian.h.lucas@protonmail.com
ianhunterlucas@outlook.com

NOTICE OF ELECTRONIC SIGNATURE

In accordance with the applicable rules of the Circuit Court of Davidson County, Tennessee, and any relevant electronic filing protocols, this document includes the use of an electronic signature. The designation "/s/ Ian Hunter Lucas" serves as the legally binding equivalent of a handwritten signature for all purposes related to this filing.

By affixing this electronic signature, I, Ian Hunter Lucas, affirm under penalty of perjury that the contents of this document are true and correct to the best of my knowledge, information, and belief. This signature is executed in compliance with all statutory requirements and the rules governing electronic filings in this jurisdiction.

Dated this ___ day of _____, 2024.
Respectfully submitted,
/s/ Ian Hunter Lucas
IAN HUNTER LUCAS
Plaintiff Pro Se
221 Charleston Avenue
Pleasant View, TN 37146
(910) 872-3577
ian.h.lucas@protonmail.com

CERTIFICATE OF SERVICE

ianhunterlucas@outlook.com

I hereby certify that on this <u>6th</u> day of <u>October</u>, 2024, a true and correct copy of the foregoing Verified Complaint was filed under seal and is therefore not served upon any party until further notice by the Court.

Pursuant to the Court's order, and in compliance with 31 U.S.C. § 3730(b)(2), this document remains under seal and is subject to in-chamber review. Service upon the Defendants will be executed in accordance with the Court's directives once the seal is lifted.

Respectfully submitted,
/s/ Ian Hunter Lucas
IAN HUNTER LUCAS
Pro Se
221 Charleston Avenue
Pleasant View, TN 37146
(910) 872-3577
ian.h.lucas@protonmail.com
ianhunterlucas@outlook.com